

Exhibit 2



July 21, 2014

Via Electronic Filing

Hon. Jesse M. Furman
United States District Court, Southern District of New York

RE: *In Re: General Motors LLC Ignition Switch Litigation*, 14-MD-2543
(JMF); 14-MC-2434 (JMF)

Your Honor:

Plaintiffs, through Temporary Lead Counsel, respectfully submit this Status Letter, which responds to the categories of information requested in Order No. 1.

1. Brief statement of the nature of the action and/or the principal defenses thereto, including any critical legal issues involved in the case.

The putative class actions largely present claims for economic loss, asserting violations of state consumer protection laws, breach of implied warranties and violation of the federal Magnuson-Moss Act, 15 U.S.C. § 2301, *et seq.*, consumer fraud, fraudulent concealment, and claims arising under the Racketeer Influence and Corrupt Organizations Act (“RICO”), 18 U.S.C. § 1961, *et seq.* The common thread tying all claims and all cases together is whether GM made misrepresentations and omissions concerning the safety of its vehicles and as a result caused economic injury to the Plaintiffs and whether New GM’s course of conduct regarding the now-recalled vehicles violates these federal and state laws.

New GM’s principal defense to the action to date is whether and to what extent the 2009 bankruptcy reorganization and “Sale Order” may shield it from liability arising from the conduct of Old GM. But Plaintiffs believe that, as a matter of due process, the Sale Order and the anti-suit injunction in the Sale Order cannot be applied to the ignition switch claimants because Old GM failed to provide class members with notice of their claims. If the Bankruptcy Court agrees with Plaintiffs, they will proceed with successor liability claims against New GM in this Court. But even if the Sale Order applies to Plaintiffs, it cannot bar claims based solely on the conduct of New GM that did not occur until after the Sale Order, including vehicle models manufactured and sold thereafter and New GM’s recall-related conduct, including its deferral of recalls from 2009 to 2014.¹ Even if they are limited to claims based solely upon the conduct of New GM, Plaintiffs’ claims will be strong because New GM retained many, if not most, of Old GM’s employees (including those who knew of the defect), inherited all of Old GM’s files, knew long

¹ For example, the ignition switch recalls include the 2010 Saturn Sky, the 2009-10 Pontiac Solstice, the 2009-10 Pontiac G5, the 2009-11 Chevy HHR, and the 2009-10 Chevy Cobalt. Plaintiffs believe the Court should withdraw these claims from the Bankruptcy Court forthwith.

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before the recalls that the defects existed, and failed in its duty to disclose its knowledge of the defects to NHTSA. Furthermore, New GM explicitly assumed the responsibility to report safety defects with respect to vehicles sold by Old GM.

Plaintiffs also expect New GM to also raise a variety of defenses usually asserted in automobile litigation, such as preemption, lack of privity, failure to present a warranty claim pre-suit, lack of actual defect manifestation in certain vehicles, no misrepresentations or omissions, lack of causation, and various challenges to class certification. Plaintiffs believe that New GM's defenses will fail.

New GM was recently forced to disclose that it had been concealing a staggering and unprecedented number of known safety defects in GM-branded vehicles, due in large measure to GM's focus on cost-cutting over safety, its affirmative efforts to discourage employees from raising safety issues, and its campaign to train employees to avoid using language such as "stalls," "defect," or "safety issue" in order to avoid attracting the attention of regulators.

In February and March of 2014, New GM issued three recalls for a combined total of 2.19 million vehicles with a dangerous ignition switch defect that causes vehicles to shut down during ordinary driving conditions, causing stalls, power-steering and power-brake loss, and the failure of airbags to deploy in a collision. Approximately the same 2.19 million vehicles were recalled again in April 2014 for another ignition-related defect. Then, throughout June and July 2014, New GM announced recalls for an additional 10.8 million vehicles for similar ignition switch defects, bringing total ignition switch-related recalls to roughly 13 million vehicles. For years before it was finally forced to act, New GM knew about this highly dangerous defect that has caused at least 13 deaths – and probably many more. On May 16, 2014, New GM entered a Consent Order with NHTSA in which it admitted that it violated the TREAD Act (49 U.S.C. §§ 30101-30170) by not disclosing the ignition switch defect, and agreed to pay the maximum available civil penalties for its violations. GM's now highly publicized campaign of deception in connection with the ignition switch defect sent shockwaves throughout the country, and began a continuing erosion of consumer confidence in the GM brand.

Unfortunately for all owners of vehicles sold by GM, the ignition switch defect was only one of a seemingly never-ending parade of recalls in the first half of 2014 – many concerning safety defects that had been long known to GM. New GM has been forced to recall over 25.6 million vehicles in some 51 recalls covering various defects during the first seven months of 2014 – approximately 60% more recalls than in a normal complete year and 30 times more cars recalled than during the same period in 2013.

New GM breached its obligations and duties to its customers to make truthful and full disclosures concerning its vehicles – particularly, the safety and reliability of its vehicles and the importance of safety to the Company. GM's false representations of the safety and reliability of its vehicles, and its concealment of a plethora of known safety defects plaguing its vehicles and its brand, caused Plaintiffs and the Class to purchase GM vehicles under false pretenses. Plaintiffs and putative class members therefore purchased vehicles for more than they otherwise would have (or would not have purchased those vehicles at all), and they were injured and/or put at risk of injury in vehicles they did not know (or have reason to know) were defective. As New

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GM's Chief Executive Officer, Mary Barra, has admitted: "Something went wrong with our process..., and terrible things happened."

2. Statement of all existing deadlines, due dates, and/or cut-off dates.

Temporary Lead Counsel asked all Plaintiffs' Counsel to report on any outstanding deadlines and due dates in their cases. As a result of stays and of the MDL centralization process, there appear to be no operative deadlines, due dates, and/or cut-off dates in the MDL cases. For purposes of clarification, an Order of this Court vacating all such dates may be desirable in order to create a clean slate for the management of these proceedings.

3. Brief description of any outstanding motions.

The plaintiffs in *Benton v. General Motors LLC*, Case No. 5:14-CV-00590 (C.D. Cal.) (transferred to this Court on June 11, 2014) filed a motion for a preliminary injunction and provisional class certification to force GM to provide free rental cars to owners of recalled vehicles until those cars are repaired. Although GM promised dealers and Congress that the free rental car program would be available, GM has failed to describe or even mention the option in its recall notices to consumers in violation of California, Connecticut, and Virginia statutes that explicitly require auto manufacturers to fully disclose in recall notices all aspects of available "adjustment programs." Many customers have been told loaner cars are not available, while the recalls are delayed for lack of replacement parts. The motion was stayed before *Benton* was transferred by the MDL Panel. Counsel intend to renew this motion.

In addition, there was a motion for expedited discovery in the *Maciel, et al. v. General Motors LLC* matter (Case No. 4:14-cv-01339-JSW (N.D. Cal.)) (transferred to this Court on June 9, 2014) that was denied "without prejudice to refiling before MDL or this Court after stay is lifted." The motion sought the documents that GM had produced to governmental agencies for purposes of discovery into the adequacy of the recalls. Temporary Lead Counsel believe that this motion need not be presented because the Court should order the immediate production of all such documents plus documents provided to the Valukas team as an initial step in this MDL.

4. Brief statement with respect to whether a single consolidated complaint (or multiple consolidated complaints) can or should be filed in this action.

In *Toyota*, Judge Selna first ordered the production of all documents that Toyota produced to Congress. So that plaintiffs' lead counsel could review this material prior to filing a consolidated complaint. Plaintiffs' lead counsel were then given the task of reviewing all of the existing complaints and deciding what claims should be asserted by the class or classes. As the Court can imagine, the hundreds of complaints that had been filed pursued a wide variety of claims, some of which were duplicative, obsolete, or unreflective of developing facts and some were simply not well taken as a matter of law. After the consolidated complaint was filed, counsel who believed that their claims should have been included, but were not, were provided a deadline in which to object and attempt to convince the Court that their claims should be included.

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Temporary Lead Counsel recommend that the same procedure be followed here. All documents produced by GM to the government and made available to the Valukas team should be produced immediately. The Plaintiffs' leadership team and our experts can then review these documents and all existing complaints and theories, make much more informed decisions, and file a consolidated class action complaint on behalf of all appropriate classes and/or subclasses and for all appropriate claims. Plaintiffs' counsel would then have 15 days thereafter to object if their claims are not included.

5. Brief description of any discovery that has already taken place (including, but not limited to, any discovery that has taken place in connection with the proceedings before the United States Bankruptcy Court) and of any discovery that is necessary for the parties to engage in meaningful settlement negotiations.

Temporary Lead Counsel asked all Plaintiffs' Counsel to report on the status of motions and discovery in their cases. There has been no formal discovery of which we are aware in any of the actions that have been transferred to this Court, nor any discovery in the bankruptcy proceedings.

However, GM has produced significant "discovery" in other forums. For example, GM has produced voluminous discovery to the federal government. At last count in mid-June, GM had produced several-hundred-thousand pages of documents to the House Energy & Commerce Committee, but most have not yet been publicly released. We also believe that GM has produced significant discovery to a Senate committee investigating various GM product recalls. And GM has recently provided documents to NHTSA on its various defective ignition system recalls.

GM retained attorney Anton Valukas to conduct an internal investigation of GM's conduct in connection with the February/March 2014 ignition switch defect recall. In announcing the retention, GM's CEO stated:

I've asked former U.S. Attorney Anton Valukas to conduct a thorough and unimpeded investigation of the actions of General Motors. He has free rein to go where the facts take him, regardless of the outcome. The facts will be the facts. Once they are in, my management team and I will use his findings to help assure this does not happen again. We will hold ourselves fully accountable.²

Mr. Valukas's team conducted the investigation over an approximate 70-day period, interviewed approximately 230 witnesses, and had access to over 40 million documents. In her prepared

² See Written Testimony of General Motors Chief Executive Officer Mary Barra Before the House Committee on Energy and Commerce Subcommittee on Oversight and Investigations "The GM Ignition Switch Recall: Why Did It Take So Long?", April 1, 2014.

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remarks before Congress on June 17, 2014, CEO Barra acknowledged fulfilling her pledge to share Mr. Valukas's findings with Congress, the company's regulators, NHTSA, and the courts.³ Plaintiffs should be given access to the documents as well as the factual statements contained in the notes of the witnesses interviewed by Mr. Valukas and his team that underlie the report's findings.

All of GM's pre-discovery disclosures should be produced here immediately. It would not burden GM, which has already gathered the documents, and immediate production will undoubtedly streamline and substantially advance the litigation.⁴ GM continues to publicly reaffirm its commitment to transparency, most recently in Ms. Barra's July 17 testimony to Congress.⁵ Accordingly, production of documents and the discovery process should be unencumbered by onerous protective orders, privilege battles, or other disputes. Federal Rule of Evidence 502 provides additional protections that should eliminate inappropriate privilege claims as an impediment to expeditious and comprehensive production. Further, the production and review of these documents will facilitate the planning of depositions of key witnesses.

Meaningful settlement talks would require production of the foregoing information, which can occur swiftly and without undue burden or cost, and production of (i) data sufficient to identify class size and composition for each type of claim alleged; (ii) data sufficient to allow rough estimations of Defendants' gains from the lease and sale of the vehicles at issue and of diminution in value calculations; (iii) internal documentation relating to the alleged defects and the degree of timing of defendants' knowledge of the defects, including internal audits and tests; (iv) documents relating to the conduct and progress of Defendants' recalls, including repair protocols and actual data tracking the timing and scope of repairs; and (v) any other information typically encompassed by Rule 26(a) Initial Disclosures.

6. List of all prior settlement discussions, including the date, the parties involved, and the approximate duration of such discussions, if any.

We are aware of no settlement discussions relating to the allegations in the class actions that have been, or are being, transferred and centralized in this Court.

GM has publicly announced its commitment to provide compensation to injury victims regardless of the bankruptcy and has appointed attorney Ken Feinberg to develop and administer a resolution protocol. The protocol was announced on June 30, 2014, and the GM Ignition Compensation Claims Resolution Facility will accept claims beginning August 1, 2014. Claims

³ <http://media.gm.com/media/us/en/gm/news.detail.html/content/Pages/news/us/en/2014/June/0617-barra-testimony.html>.

⁴ See MANUAL FOR COMPLEX LITIGATION (FOURTH) at § 11.13.

⁵ See <http://www.c-span.org/video/?320418-2/hearing-gm-recalls-corporate-culture-part-2>.

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will be paid at Mr. Feinberg's sole discretion. The protocol is available on the GM protocol website, www.GMIgnitioncompensation.com.

Prior to the June 30 announcement, Mr. Feinberg engaged in informal discussions with Plaintiffs' counsel who represented clients with a significant number of death and injury claims (including counsel who also represent class action plaintiffs), and who made recommendations regarding the scope of vehicles to be included, the procedures to be utilized, and the benefits to be provided, in the protocol. Some but not all of these suggestions are reflected in the current protocol. While the current protocol offers a path to resolution for some death and injury claims, it does not include all of the vehicles on GM's list of recalled vehicles that are the subject of this litigation, and the protocol does not provide compensation for all of the injuries that have occurred. The protocol seems to be lagging behind the ignition system recall: less than 1/3 of the recalled vehicles are included. We do not know whether the protocol will be expanded to be more inclusive; Plaintiffs' counsel will continue to advocate for such expansion, and for other improvements and refinements to the protocol.

Given that the protocol is not comprehensive, Temporary Lead Counsel expect that death and injury complaints will continue to be filed and prosecuted, and those suits filed in or removed to federal court will continue to be identified by GM as tag-along components of this MDL.

7. Statement with respect to whether court-ordered mediation would be useful and, if so, whether such mediation should be conducted by the assigned Magistrate Judge, through the Court's mediation program, or by a privately retained mediator and when such mediation should be conducted.

At this time, mediation of the class action claims is premature. We respectfully submit that Court-ordered mediation, through a private mediator or special master appointed by the Court, should occur at the end of core discovery in this matter. Early discovery will enable the parties to engage in mediation on an informed basis and is essential if a settlement is presented to the Court for approval under Rule 23(e). And early resolution (among other benefits) may enable faster repair protocols in the interests of public safety; provide much-needed economic assistance to clients who have suffered personal injuries in particular; and expedite the commencement of potential injunctive or programmatic relief (including, for example, potential monitoring of internal quality control, safety, and reporting protocols) that would ensure similar problems do not recur.

Regarding mediator selection, Plaintiffs suggest that the Court appoint a private mediator from a suggested list compiled by the parties if the parties cannot agree on a mediator. We have no doubt that the Magistrate Judges of this District are qualified to lead mediation efforts, but their other duties may preclude the intensive involvement that may be essential to a productive mediation process here. Plaintiffs believe that given the scope and complexity of the litigation (e.g., the inclusion of both economic loss and personal injury claims in the case, the added complexity of the bankruptcy, and the unusual wrinkle that, unlike in most large auto defect cases, the recalls and revelations of multiple ignition system defects are continuing and overlapping), it is essential to have a mediator that is familiar with the resolution of large

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complex litigations (and preferably large auto defect litigation) and also has the time necessary to be an active coordinator of multiple mediation sessions and inter-session conferences with the parties.

8. List of all related cases pending in state or federal court, together with their current status, including (a) discovery taken to date and pending motions, to the extent known; and (b) whether the cases have been stayed pending a decision on General Motors' motion to enforce filed in the Bankruptcy Court on April 21, 2014.

Temporary Lead Counsel for the Ignition Switch MDL Plaintiffs have reached out and conferred with plaintiff's counsel throughout the country and GM's counsel in an effort to provide the Court with a list of all related cases pending in state or federal court not already in the MDL, including status of discovery, motions, and whether the cases have been stayed. The parties have agreed that GM shall provide this information in their submission, and Plaintiffs respectfully refer the Court to GM's status conference statement.

9. List of all parents, subsidiaries, and companies affiliated with the corporate parties and of all counsel associated in the litigation to help the Court identify any problems of recusal or disqualification.

With respect to the corporate parties, Temporary Lead Counsel assumes that this information will be provided by counsel for the corporate party defendants, as required by Fed. R. Civ. P. 7.1(a), (b)(1). However, according to Fed. R. Civ. P. 7.1 disclosure statements previously filed by GM, *see* Dkt. No. 90 (filed Apr. 18, 2014), Defendant General Motors LLC is a Delaware limited liability company with its principal place of business in Michigan. General Motors LLC is 100% owned by General Motors Holdings LLC, which is a Delaware limited liability company with its principal place of business in Michigan and is 100% owned by General Motors Company. General Motors LLC and General Motors Holdings LLC are subsidiaries of General Motors Company, which is a Delaware corporation with its principal place of business in Michigan. No publicly held entity owns 10% or more of the stock of General Motors Company.

Delphi Automotive PLC previously filed a corporate disclosure statement stating that it has no parent corporations, and that no publicly held corporation owns 10% or more of its stock.⁶

There are other corporate defendants in the economic loss and injury/wrongful death cases, including car dealerships,⁷ but Plaintiffs do not believe that any such entities have any

⁶ See Dkt. No. 86.

⁷ See, e.g., Bedford Auto Wholesale, Inc., Dkt. No. 65.

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parent corporations or that any publicly held corporations own 10% or more of their stock. All known counsel for Plaintiffs and Defendants are listed in Exhibit 1.

10. Other information that the parties believe may assist the Court in advancing the case to settlement or trial, including, but not limited to, a description of any dispositive issue or novel issue raised by the case.

a. The Court should closely coordinate with the Bankruptcy Court and quickly identify the discovery and substantive issues that should move forward here.

These cases raise issues of coordination between this Court and the Bankruptcy Court, among the most important being preserving in this Court the oversight and control of all legal and factual issues that underlie the cases transferred here to ensure that all discovery takes place here and substantive motions that relate in any way to the issues raised in the actions be decided in this Court. Indeed, the MANUAL FOR COMPLEX LITIGATION explains that it is “especially important for the bankruptcy and district judges handling the various aspects of the bankruptcy case to have frequent communications so that the matters can proceed in a coordinated fashion.”⁸ The MANUAL even describes a procedure under 28 U.S.C. § 157(d) for partially withdrawing a bankruptcy reference in mass tort cases, or for placing jurisdictional limitations on the bankruptcy court’s authority on certain issues.⁹

In scheduling orders and comments at both of the status conferences, Judge Gerber has recognized the need for coordination and the importance of resolving bankruptcy threshold issues (e.g., whether Plaintiffs’ due process rights were violated in connection with the Sale Motion and the Sale Order and Injunction, or alternatively, whether Plaintiffs’ procedural due process rights would be violated if the Sale Order and Injunction is enforced against them).¹⁰

⁸ MANUAL FOR COMPLEX LITIGATION (FOURTH) at § 22.52.

⁹ *Id.*

¹⁰ See May 16, 2014 Scheduling Order (Dkt. No. 12697) at 2 (ordering that no discovery take place with respect to the Motion, the Objection or the Adversary Proceeding until further order of this Court); July 11, 2014 Supp. Scheduling Order (Dkt. No. 12770) at 4-5 (declining to authorize discovery); 7/2/2014 Tr. at 13:11-15 (“I also have an obligation to the system and to Judge Furman to keep this train moving on schedule and to try to reach an expeditious resolution here. And our challenge is going to be finding the sweet spot where we accomplish both goals.”); 7/2/2014 Tr. at 48:23-49:4 (“Because we have parallel proceedings in the District Court on the one hand and in this Court on the other. And I think you would understand and respect that each Court’s instinct at least would be to try and minimize the extent to which it steps on the toes on the other and, also, to try to make things as easy as it could for the other.”); 7/2/2014 Tr. at 57:20-58:2 (“I think doing as much as we can on stipulated facts is hugely important because, as I indicated, deferring these matters to rate discovery would materially, dramatically, seriously keep adding adverts. I think it’s all really bad, slowed things down before me and, as a corollary, before Judge Furman. So we’re going to do as much as we can to keep things moving forward as quickly as possible consistent with getting the result that’s just.”); 5/2/2014 Tr. at 96:25-97:4 (“As a general matter, we’re going to get as far as we can without discovery. And notwithstanding what my case management

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Plaintiffs respectfully submit that it is appropriate for this Court, as an Article III Court and Section 1407 – Transferee Court, to identify the issues that may move forward here before the Bankruptcy Court decides the threshold issues – a process that Judge Gerber has indicated will take the balance of the year. Pursuant to the 2009 GM Bankruptcy 363 Sale Order, New GM agreed to be responsible for complying with the TREAD Act, the Safety Act, Lemon Laws, and California Health & Safety Code regarding any and all GM vehicles made before or after said Order. Under this agreement, New GM would be responsible for its failures to comply with above-said responsibilities. Temporary Lead Counsel believe that the Court should decide whether cases that assert claims involving only New GM's conduct and/or pertain only to New GM vehicles should be immediately withdrawn from the Bankruptcy Court.

b. Questions about the ongoing and ever-expanding recalls demonstrate the need for prompt Court supervision of GM.

In Congressional testimony last week, GM's General Counsel blamed his in-house attorneys for GM's failure to act to correct an internally known safety hazard. The Valukas Report blamed the GM corporate structure and culture. GM's CEO has made similar public admissions. These statements provide a roadmap for depositions, which can and should commence promptly after receipt of and procession of the Valukas and government documents. The Judicial Panel on Multidistrict Litigation noted the pendency of the bankruptcy proceedings in this District, and Your Honor's prior determination of GM bankruptcy appeals, in its finding that transfer here would enable the advancement of "these complex proceedings expeditiously." 6/9/2014 Transfer Order. Production of documents and conduct of depositions on common questions of facts is a core function of Section 1407 proceedings and the assigned role of this Court. Centering these activities in the MDL will also assist, as necessary, any determinations to be made by the Bankruptcy Court that require discovery.

There have been six separate ignition system-related recalls in 2014 (one as recent as July 3) implicating more than 13 million cars, and issues relating to the recall cannot be divorced from the litigation. The repairs are proceeding extremely slowly, millions of owners are being inconvenienced and endangered daily, and Plaintiffs believe that prompt Court supervision over the process is warranted. GM sponsored a recent *Wall Street Journal* ad telling ignition defect consumers that, while they wait for repairs, they should remove all items from their key rings because "the weight of a single key can't move the switch to the wrong position." This suggests further delays. Thus, GM has substituted a "one key" ad campaign for prompt and effective replacement of its faulty systems.¹¹ The threat to safety remains, and crashes continue. In addition, as these recalls are ongoing they raise issues of evidence preservation that the MDL

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order otherwise provides, there will be no discovery in either the adversary proceeding or the contested matter until and unless I order otherwise.").

¹¹ Plaintiffs also note that they will seek discovery relating to the testing GM undertook to supports its new safety assertions about using a single key.

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court needs to address and supervise now. Temporary Lead Counsel intend to suggest that ongoing preservation needs to be among the first topics to be addressed as part of the MDL. This case is markedly different from a typical single-defect recall case, where the principal issues are economic remedies with a discrete, singular recall proceeding outside the scope of the litigation. The GM ignition system debacle is unfolding in real time, and this Court has a unique opportunity to monitor, supervise, and improve the process, to avoid or mitigate both economic and physical harm, to expedite the recalls, and to conserve the resources of the parties while holding GM accountable, as is fair, for the conduct it has acknowledged.

Respectfully,

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Exhibit 1

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Ashworth v. General Motors	Gregory O. Wiggins Kevin W. Jent Robert F. Childs, Jr. Rocco Calamus, Jr. Wiggins Childs Quinn & Pantazis The Kress Building 301 19th Street, North Birmingham, AL 35203-3204
Balls v. General Motors LLC	Marc M. Seltzer Kalpana Srinivasan Steven G. Sklaver Susman Godfrey LLP 1901 Avenue of the Stars Ste 950 Los Angeles CA 90067-6029

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Bedford Auto Wholesale, Inc. v. General Motors LLC	Philip J. Goodman Michael B. Serling, PC 280 N. Old Woodward Ave., Ste 407 Birmingham MI 48009-5394 Jayne Conroy Hanly Conroy Bierstein Sheridan Fisher & Hayes LLP 112 Madison Ave., 7th Floor New York, NY 10016-7416 Jodi Westbrook Flowers Motley Rice LLC 28 Bridgeside Blvd Mount Pleasant SC 29464 Mark R. Koberna Sonkin & Koberna, LLC 3401 Enterprise Parkway, Suite 400 Cleveland, OH 44122
Bender v. General Motors LLC	Jasper D. Ward, IV Jones Ward PLC 312 South 4th Street, 6th Floor Louisville, KY 46202

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Burton v. General Motors LLC	Edward L. White Edward L. White, PC 853 E. 33rd Street Edmond OK 73013
Cain v. General Motors LLC	Kevin R. Duck Duck Law Firm 5040 Ambassador Caffery Parkway, Suite 200 Lafayette, LA 70508 Richard C. Dalton Law Office of Richard C. Dalton 1343 W. Causeway Approach Mandeville, LA 70471
Camlan Inc. v. General Motors LLC	Joseph W. Cotchett Frank M. Pitre Philip L. Gregory Alexandra A Hamilton Frank C. Damrell, Jr. Cotchett Pitre & McCarthy LLP 840 Malcolm Road Burlingame, CA 94010
Carriuolo v. General Motors Company	Donald R. Fountain, Jr. Clark, Fountain, La Vista, Prather, Keen & Litky-Rubin, LLP 1919 N. Flagler Drive, Suite 200 West Palm Beach, FL 33407 Jeffrey M. Liggio Liggio Benrubi

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